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Attorneys for Plaintiff
12 UNITED STATES OF AMERICA
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14 UNITED STATES DISTRICT COURT
15 FOR THE CENTRAL DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,
17 Plaintiff,
18 v.
19 CHARLES KLASKY,
20 Defendant.
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No. CR 17-401-DMG

STIPULATION TO CONTINUE
SENTENCING DATE

Current Sentencing Date:
August 11, 2021 at 11:00 a.m.
Proposed Sentencing Date:
January 12, 2022 at 11:00 a.m.
Location:
Courtroom of the
Honorable Dolly M. Gee

24 Plaintiff United States of America, by and through its counsel
25 of record, Assistant United States Attorneys Kristen A. Williams,
26 Cathy J. Ostiller, and Alexander C.K. Wyman, and defendant Charles
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1 Klasky, by and through his counsel of record, William Fleming,
2 hereby stipulate as follows:

3 1. On or about July 5, 2017, the government filed an
4 information charging defendant with one count of conspiracy to
5 commit health care fraud in violation of Title 18, United States
6 Code, Section 371.

7 2. On August 9, 2017, defendant pled guilty to the single-
8 count information. Sentencing was initially set for November 15,
9 2017, but has since been continued, most recently to August 11,
10 2021.

11 3. The Probation Officer has not yet disclosed the
12 Presentence Report to the parties and, pursuant to Federal Rule of
13 Criminal Procedure 32(e)(2), is not yet obligated to do so.

14 4. Pursuant to his plea agreement with the government,
15 defendant is currently cooperating with the government regarding
16 United States v. Omid, et al., CR 17-661(A)-DMG, and is anticipated
17 to provided testimony during trial in that case, which is currently
18 set for September 21, 2021. The government needs to consider fully
19 any assistance provided by defendant in connection with that case
20 prior to taking a position as to defendant's substantial assistance
21 at sentencing.

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1 5. Accordingly, by this stipulation, the parties jointly move
2 to continue the sentencing date from August 11, 2021, to January 12,
3 2022.

4 IT IS SO STIPULATED.

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6 Dated: April 16, 2021

TRACY L. WILKISON
Acting United States Attorney

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8 BRANDON D. FOX
Assistant United States Attorney
Chief, Criminal Division

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11 KRISTEN A. WILLIAMS
CATHY J. OSTILLER
ALEXANDER C.K. WYMAN
12 Assistant United States Attorneys

13 Attorneys for Plaintiff
UNITED STATES OF AMERICA

14
15 Dated: April 20, 2021

16 /s/ William Fleming by email
authorization
WILLIAM FLEMING

17 Attorney for Defendant
18 CHARLES KLASKY